

# **EXHIBIT 41**



UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado  
corporation; ORACLE AMERICA,  
INC. a Delaware corporation; and  
ORACLE INTERNATIONAL CORPORATION,  
a California corporation,

Plaintiffs,

vs.

No. 2:10-cv-0106-LRH-PAL

RIMINI STREET, INC.,  
a Nevada corporation;  
SETH RAVIN, an individual,  
Defendants.

\_\_\_\_\_/

Videotaped deposition of DENNIS CHIU,  
taken at Boies, Schiller & Flexner, LLP, 1999  
Harrison Street, 9th Floor, Oakland, California,  
commencing at 8:54 a.m., Friday, June 24, 2011,  
before Leslie Rockwood, RPR, CSR No. 3462.

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## 1 APPEARANCES OF COUNSEL:

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3 FOR THE PLAINTIFF ORACLE USA, INC.:

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15 FOR THE DEFENDANT RIMINI STREET, INC.:

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## 1 APPEARANCES OF COUNSEL (Continued):

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10 ALSO PRESENT:

11 Suzanne Jaffe

12 Fred Norton, Esq. (Briefly)

13 Alexei Dias, Videographer

14  
15  
16 ---oOo---

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1 FRIDAY, JUNE 24, 2011; SAN FRANCISCO, CALIFORNIA

2 8:54 A.M.

3 ---oOo---

4  
5 THE VIDEOGRAPHER: Good morning. We are on 08:52:27  
6 the video record at 8:54 a.m. on June 24th, 2011.

7 this is the videotaped deposition of Mr. Dennis Chiu.

8 my name's Alexei Dias, and our court reporter is

9 Leslie Rockwood. We are here from Veritext National

10 Deposition and Litigation Services.

11 This deposition is being held at 1999

12 Harrison Street, 9th Floor, in the City of Oakland,

13 California. The caption of this case is Oracle USA,

14 Inc., et al., versus Rimini Street, Inc., and Seth Ravin,

15 case number 2:10-cv-0106-LRH-PAL. 08:54:38

16 At this time will counsel and all present

17 identify themselves for the record, please.

18 MR. RINGGENBERG: Kieran Ringgenberg, Boies,

19 Schiller &amp; Flexner for the plaintiffs.

20 MS. LOEB: Alexis Loeb, Boies, Schiller &amp; 08:54:57

21 Flexner for the plaintiffs.

22 MS. JAFFE: Suzanne Jaffe, summer associate

23 with Boies, Schiller &amp; Flexner for the plaintiffs.

24 MR. DYKAL: Ryan Dykal, Shook, Hardy &amp; Bacon

25 for the defendant. 08:55:09

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1 MR. RECKERS: Robert Reckers, Shook, Hardy &  
2 Bacon for the defendants as well.

3 THE VIDEOGRAPHER: Thank you.

4 The witness will be sworn in, and we can  
5 proceed. 08:55:186 THE REPORTER: If you'll raise your right  
7 hand, please.8 You do solemnly state that the evidence you  
9 shall give in this matter shall be the truth, the whole  
10 truth and nothing but the truth, so help you God. 10:08:31

11 THE WITNESS: Yes.

12 THE REPORTER: Thank you.

## 13 EXAMINATION

14 BY MR. RINGGENBERG:

15 Q. Good morning, Mr. Chiu. Did you work for 08:55:30  
16 Siebel for several years?

17 A. I did.

18 Q. When did you work for Siebel?

19 A. I worked for Siebel from April 1998 until  
20 October 2005. 08:55:4821 Q. And did you work for Siebel after it was  
22 acquired by Oracle?

23 A. I did not.

24 Q. You left Siebel in connection with Oracle's  
25 acquisition or shortly thereafter? 08:55:56

2 (Pages 2 to 5)

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1 A. Yes.

2 Q. And you began work at that time for Rimini  
3 Street?

4 A. Yes.

5 Q. And what positions have you had at Rimini 08:56:04  
6 Street?

7 A. I've held the position of vice president of  
8 Siebel support services and vice president of  
9 on-boarding.

10 Q. What's your current position? 08:56:15

11 A. Vice president of our Siebel support  
12 services.

13 Q. Do you continue to have responsibility for  
14 on-boarding?

15 A. No. I primarily have responsibility for our 08:56:24  
16 Siebel support services. I --

17 Q. I'm sorry, go ahead.

18 A. Again, just for any historical references, I  
19 still help the on-boarding process a little.

20 Q. That is people on the on-boarding team might 08:56:40  
21 come to you with questions, for example?

22 A. Correct.

23 Q. When did you transition out of the role of  
24 vice president of on-boarding?

25 A. January of 2011. 08:56:49

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1 Q. And did you also handled Siebel support  
2 before January 2011?

3 A. Yes. I had primary responsibility for Siebel  
4 support practice and continued to have some overlap with  
5 our Siebel team, even just do part of the business. And 08:57:11  
6 then Kien Phung, a member of my team, was promoted to the  
7 manager of support services and had primary  
8 responsibility for the team for a period of, I think,  
9 over year.

10 Q. And what year was that? 08:57:29

11 A. 2010.

3 (Pages 6 to 9)

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4 (Pages 10 to 13)

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1 STATE OF CALIFORNIA ) ss:  
2 COUNTY OF MARIN )  
3

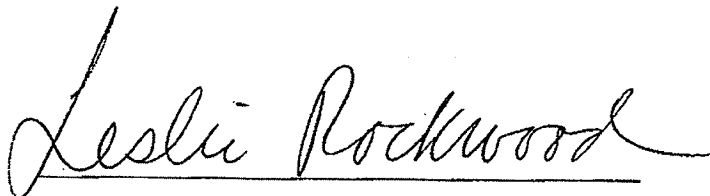
4 I, LESLIE ROCKWOOD, CSR No. 3462, do hereby  
5 certify:

6 That the foregoing deposition testimony was  
7 taken before me at the time and place therein set forth  
8 and at which time the witness was administered the oath;

9 That testimony of the witness and all  
10 objections made by counsel at the time of the examination  
11 were recorded stenographically by me, and were thereafter  
12 transcribed under my direction and supervision, and that  
13 the foregoing pages contain a full, true and accurate  
14 record of all proceedings and testimony to the best of my  
15 skill and ability.

16 I further certify that I am neither counsel  
17 for any party to said action, nor am I related to any  
18 party to said action, nor am I in any way interested in  
19 the outcome thereof.

20 IN WITNESS WHEREOF, I have subscribed my name  
21 this 5th day of July, 2011.

22  
23   
24

25 LESLIE ROCKWOOD, RPR, CSR NO. 3462

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